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<div style="border: 1px solid black; padding: 5px; margin: 10px auto; width: 150px;">MARCH 2, 2022</div>	
CLERK US DISTRICT COURT DISTRICT OF NEVADA	
BY: _____	DEPUTY _____

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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

CROWN LOGISTICS, LLC, a Nevada  
Limited Liability Company,

Plaintiff,

v.

AMERICAN SAFETY INSURANCE  
COMPANY; CONTINENTAL TRUCKING  
ASSOCIATION, INC.; CONTINENTAL  
INSURANCE AGENCY, INC.; DOES I-  
XXX; and ABC CORPORATIONS A-Z;  
inclusive,

Defendants.

Case No. 3:21-cv-00081-MMD-WGC

**ORDER GRANTING  
STIPULATION TO EXTEND DISCOVERY  
DEADLINES (FIFTH REQUEST)**

Defendant American Safety Insurance Company (“Defendant American”), by and through its counsel of record Wilson, Elser, Moskowitz, Edelman & Dicker LLP, Defendants Continental Trucking Association, Inc. and Continental Insurance Agency, Inc. (collectively, the “Continental Defendants”), by and through their counsel of record Avalon Legal Group LLC, and Plaintiff Crown Logistics, LLC (“Plaintiff Crown”), by and through its counsel of record Levery & Associates Law Chtd., hereby stipulate to extend the scheduled deadlines and seek this Honorable Court’s order in accordance with the following terms, pursuant to LR 26-3:

**DISCOVERY COMPLETED**

To date the parties in this action have conducted discovery as follows:

1. On March 11, 2021, the parties conducted their Early Case Conference pursuant to FRCP 26(f).

2. On March 23, 2021, the parties filed their Stipulated Discovery Plan & Scheduling Order (Doc 15).
3. On March 23, 2021, the Court issued the Discovery Plan & Scheduling Order (Doc 16).
4. On March 25, 2021, Plaintiff Crown served its Initial Disclosures and List of Persons with Knowledge.
5. On March 25, 2021, Continental Defendants served their Initial Disclosures and List of Persons with Knowledge.
6. On March 26, 2021, Defendant American served its Initial Disclosures and List of Persons with Knowledge.
7. On May 13, 2021, Plaintiff Crown served written requests for production of documents onto Defendant American and Continental Defendants.
8. On June 7, 2021, Defendant American issued a subpoena *duces tecum* onto Tri County Independent Insurance Agency, LLC.
9. On June 10, 2021, Tri County Independent Insurance Agency served its response to the subpoena *duces tecum*.
10. On July 7, 2021, Defendant American served its response to Plaintiff Crown's written requests for production, as per a stipulated extension to answer.
11. On July 7, 2021, Defendant American served its first supplemental FRCP 26 disclosures.
12. On July 12, 2021, Defendant American served its second supplemental FRCP 26 disclosures.
13. On July 14, 2021, Continental Defendants served their responses to Plaintiff Crown's written requests for production, as per a stipulated extension to answer.
14. On July 14, 2021, Continental Defendants served their first supplemental FRCP 26 disclosures.
15. On September 1, 2021, Defendant American served written requests for production, requests for admissions, and interrogatories onto Plaintiff Crown.
16. On September 2, 2021, Continental Defendants served written requests for production and interrogatories onto Plaintiff Crown.

17. On October 12, 2021, the depositions of Defendant American's three 30(b)(6) witnesses took place.

18. On October 14, 2021, the depositions of Continental's two 30(b)(6) witnesses took place.

19. On October 15, 2021, defendants received Plaintiff Crown's responses to all sets of discovery propounded, which had been delayed by the U.S. mail.

20. On December 22, 2021, the depositions of Navneet Prashar and Ravinder Prashar took place.

21. On February 4, 2022, Plaintiff Crown served its third supplemental FRCP 26 disclosures and supplemental responses to defendants first set of interrogatories.

### **DISCOVERY THAT REMAINS TO BE COMPLETED**

1. Disclosure and depositions of experts.

2. Potential third party discovery.

### **REASONS FOR REQUESTING AN EXTENSION OF DEADLINES**

The parties applied for and received a discovery extension in order to explore settlement before disclosing experts. [ECF No. 31] However, during that time frame set for settlement discussions, counsel for American Safety experienced a death in the family, which took her out of the office for over a week, and delayed the parties' efforts to resolve the case. This stipulation is intended to allow the parties to have additional time to explore settlement before disclosing experts. Accordingly, the parties also request the other deadlines similarly be extended.

### **CURRENT SCHEDULE TO COMPLETE REMAINING DISCOVERY**

- |                                      |                                 |
|--------------------------------------|---------------------------------|
| 1. Discovery Cutoff:                 | April 28, 2022                  |
| 2. Initial Expert Disclosures:       | February 28, 2022               |
| 3. Rebuttal Expert Disclosures:      | March 28, 2022                  |
| 4. Dispositive Motions:              | May 27, 2022                    |
| 5. Pre-Trial Order:                  | June 27, 2022 (if no MSJ filed) |
| 6. Interim Status Report:            | February 28, 2022               |
| 7. Extension of Scheduled Deadlines: | April 4, 2022                   |

### **PROPOSED SCHEDULE TO COMPLETE REMAINING DISCOVERY**

- |                      |              |
|----------------------|--------------|
| 1. Discovery Cutoff: | June 6, 2022 |
|----------------------|--------------|

- |                                      |                                  |
|--------------------------------------|----------------------------------|
| 2. Initial Expert Disclosures:       | April 8, 2022                    |
| 3. Rebuttal Expert Disclosures:      | May 7, 2022                      |
| 4. Dispositive Motions:              | July 5, 2022                     |
| 5. Pre-Trial Order:                  | August 5, 2022 (if no MSJ filed) |
| 6. Interim Status Report:            | April 8, 2022                    |
| 7. Extension of Scheduled Deadlines: | May 13, 2022                     |

DATED this 23rd day of February, 2022.

DATED this 23rd day of February, 2022.

**AVALON LEGAL GROUP LLC**

**LEVERTY & ASSOCIATES LAW CHTD**

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/s/ Patrick R. Leverty

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DATED this 23rd day of February, 2022.

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**ORDER**

IT IS SO ORDERED. THE NEW DEADLINES ARE:

1. Discovery Cutoff: June 6, 2022
2. Initial Expert Disclosures: April 8, 2022
3. Rebuttal Expert Disclosures: May 7, 2022
4. Dispositive Motions: July 5, 2022
5. Pre-Trial Order: August 5, 2022 (if no MSJ filed)
6. Interim Status Report: April 8, 2022
7. Extension of Scheduled Deadlines: May 13, 2022

  
UNITED STATES MAGISTRATE JUDGE

DATED: March 2, 2022.